

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

§

§

v.

§

No. 3:19-CR-112

§

Judge Kinkeade

JOSEPH LUCIEN DUPLAIN

§

UNOPPOSED MOTION FOR TRAVEL AUTHORIZATION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES the Defendant, JOSEPH LUCIEN DUPLAIN, along with his attorney of record, and respectfully requests this honorable District Court for Authorization for Travel by Court Appointed Counsel in the above captioned matter, and in support thereof would show the court as follows:

Sentencing for the Defendant is scheduled by ZOOM Video hearing on Wednesday, March 1, 2023 at 1:30 p.m. Attorney of Record, Heath Hyde would request authorization to travel to San Diego for video sentencing on Defendant Joseph Lucien Duplain due to the age and health of the defendant making it difficult for him to travel. Due to underlying heart conditions, it could be detrimental to the Defendant to attempt to travel alone and has no one to travel with him to Texas for sentencing. The Defendant is on Pre-Trial Release and is approximately 81 years old. It is necessary for Counsel to travel to by air to San Diego, California to meet with the Defendant in person to discuss the sentencing procedures and be available with Defendant during the Sentencing hearing. Mr. Heath Hyde will be requesting permission to travel by air on the afternoon of Monday, February 27th, 2023 and will plan to return on Wednesday, March 1st, 2023 following the sentencing. While in San Diego, he will also be needing hotel accommodations.

We conferred with the Office of the United States Attorney, and Christopher Fenton states that they are also unopposed to the filing of this motion. For these reasons, we ask the court to grant this Motion for Authorization for Travel.

WHEREFORE PREMISES CONSIDERED, we respectfully ask permission for Authorization to Travel to meet with Defendant, Joseph Lucien Duplain, for his Video Sentencing hearing on March 1st, 2023.

Respectfully submitted,

/s/ Heath Hyde

HEATH HYDE

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Attorney for DEFENDANT

CERTIFICATE OF CONFERENCE

I, Heath Hyde, Attorney of Record, do hereby certify that I have conferred with Assistant United States Attorney, Christopher Fenton, and he is not opposed to the filing of this motion on.

/s/ Heath Hyde

HEATH HYDE

CERTIFICATE OF SERVICE

I, Heath Hyde, Attorney of Record, do hereby certify that a copy of the aforementioned Motion for Authorization to Travel has been served upon all Counsel of Record by the CM/ECF system.

/s/ Heath Hyde

HEATH HYDE